

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re:

Mongi Ferjani,
Virginia Ferjani,

Debtors.

Case No. 23-11430-pmm

Chapter 13

Related to ECF No. 37

**Debtors' Response to
Chapter 13 Standing Trustee's Motion for Dismissal**

AND NOW, Debtors Mongi Ferjani and Virginia Ferjani, by and through their attorney, hereby respond to the Motion for Dismissal filed by Chapter 13 Standing Trustee Kenneth E. West.

The Debtors oppose the motion. The Debtors provided evidence of insurance coverage to the Trustee, thus no grounds for relief exist and the Court must deny the motion.

NOW, THEREFORE, the Debtors ask this Court to grant relief in the form of order attached and to grant such other relief in their favor as may be necessary and proper under the law.

Date: January 10, 2024

CIBIK LAW, P.C.
Counsel for Debtors

By: /s/ Michael A. Cibik
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Certificate of Service

I certify that a true and correct copy of the Debtors' Response to the Chapter 13 Standing Trustee's Motion for Dismissal was served on Kenneth E. West through the CM/ECF system along with all attachments.

Date: January 10, 2024

/s/ Michael A. Cibik
Michael A. Cibik